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April 12, 1977

TO:

Wayne Denniston

Air Pollution Control

FROM:

R. J. Courchaine

APR 14 1977

SUBJECT:

TOXIC AND HAZARDOUS MATERIALS, DISTRICT NO. 1

The following problems which appear on Roy Schrameck's report need to be given high priority.

Pennwalt Chemical Company, West Plant, Wyandotte: Report indicates organic chemicals, phenols and amylamine stored in diked and undiked areas posing a potential threat to waters of the state. At a March 10, 1977, meeting district staff stated that the company uses chlorinated hydrocarbons. Are any of those compounds present in any discharge from the Company? This needs to be checked out. Also staff needs to review the PIPP to see if it has been submitted, approved and implemented. I would like a report on this one before the end of this month.

- 2. Detrex Chemical Industries, Redford Township, Wayne County: "Company stores unknown organic and inorganic chemicals in a drum storage area." Our discussion of this on March 10, 1977, disclosed that the PIPP plan had been approved. We need to inventory the number of drums, determine quantity of materials in storage and identify the organic and inorganic chemicals in storage. It is essential to know what we are dealing with in order to determine if storage is proper and safe. We need to make a site investigation with the PIPP in hand to determine if the plan has been fully and properly implemented. Please get staff on this ASAP and initiate appropriate corrective action and give me a report. Is this a chemical supplier, processing plant or industrial waste treatment facility? Should we have a Section 5 permit to store polluting materials?
- 3. Hughes Chemical Company, Adrian: "Company stores unknown organic wastes. Loss would be to East Side Drain." Staff indicated PIP plan had been approved. Same comments and questions apply as to No. 2 above. Find out amount and kinds of organic and inorganics in storage. These are indicated as wastes. Does this Company dispose of these at any time (or just store them)? How are they disposed of? Have we made a plant investigation to determine if PIPP has been fully implemented? Please get staff on this ASAP, initiate appropriate corrective action and give me a report.
- 4. Royster Company. Milan (Two plants): Report indicates herbicides, insecticides, and pesticides stored at both locations with potential for losses to the ground and surface waters. Staff indicated the PIP plans had been approved. We need close staff follow-up to assure that the containment and pollution incident plans have been fully implemented and ere sufficient to contain these dangerous chemicals. Suggest a permit for storage under Section 5 of the Water Resources Commission Act be issued ASAP with requirements for appropriate controls of inventory, storage and reporting.

- Sperry Vickers Company, Ferndale and Troy: Xylene, Cumene, chloriuated benzene, pthalates and PCB is in storage in diked areas. PIP plans have been approved, but need staff follow-up to determine if they have been fully implemented. Are dikes secure and adequately constructed? Is waste being generated and discharged to these storage areas? What is the ultimate fate of the material? We should have a Section 5 storage permit to control. inventory or incorporate this requirement in any existing permit. Please have staff follow up on this and give me a report.
- 6. Anderson Development Company, Adrian: Anilines and other organic chemicals seeping from treatment ponds to waters of the state. Staff indicated the lagoon would be sealed and the lagoon would be aerated for pretreatment prior to discharge to the sanitary system. Apparently aeration of the lagoon contents would aggravate the odor nuisance complaints and we should not approve this without first discussing it with the Air Quality Division staff. Please ask staff to discuss this with Air.
- 7. Celanese Coatings Company, Detroit: Company stores xylene. PIP plan approved. Need to have staff follow up to determine implementation and compliance with the approved plan.

RJC/hb

cc: W. G. Turney

Lee Jager/

- J. Bohunsky
- R. Schrameck
- G. Guenther